

**PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 22, 2006 Written  
comments are to be sent to the above address.**

**WRITTEN COMMENT DEADLINE: OCTOBER 16, 2006**

Date: 10/6/2006

From: David W. Ware, Manger Codes & Regulation



Agency, jurisdiction, chapter, company, association, individual, etc.

Owens Corning

Street City State Zip: 2280 Grass Valley Hwy, #172; Auburn, CA 95603

I/We (do) (do not) agree with: ☒ The Agency proposed modifications As Submitted on Section No.

1408.2 and 1408.2.1

and request that this section or reference provision be recommended: ☐ Approved ☐ Disapproved

☐ Held for Further Study ☒ Approved as Amended

by the reviewing Code Advisory Committee.

**Suggested Revisions to the Text of the Regulations:**

**1408.2 Adhered Veneer.** Units of tile, masonry, stone or terra cotta which exceed 5/8 inch (16 mm) in thickness and are greater than 15 psf shall be applied as for anchored veneer where used over exit ways or more than 20 feet (6096 mm) in height above adjacent ground elevation.

**1408.2.1 Bond Strength and Tests.** Veneer shall develop a bond to the supporting element backing of sufficient strength to provide a working shear stress of 50 psi (690 kPa) in accordance with ACI 530, Section 6.3.2.4.

~~Not less than two shear tests shall be performed for the adhered veneer between the units and the supporting element. At least one shear test shall be performance at each building for each 5,000 square feet (465 m2) of floor area or fraction thereof.~~

**Reason:** [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

*Current language of Section 1408.2 does not meet Approval Criteria #4 and #6.* The need to assure reasonably safe exit ways is acknowledged but the current wording arbitrarily limits the types of units that can be used above exit ways based on size rather than tying limitations of this section to the structural integrity of the wall assembly. Typical units of adhered veneer products come in various sizes and thickness; and many of a given type are not uniform in their exterior surface, creating a random thickness across the plane of the adhered veneer product. Enforcement of the 5/8 inch thickness criteria leaves sole discretionary approval for installations to the building official. One of the primary purposes of Section 1408 is to ensure the structural integrity of the wall assembly when anchored and adhered veneer materials are used. To this end, weight limits are already established for adhered masonry veneer in Sections 1405.9 (e.g., referencing ACI 530) and 1405.9.1. Since structural integrity is more a function of weight as opposed to thickness, a more equitable and enforceable approach to meeting the intent of language in Section 1408.2 is to place specific weight limits for these products. ACI 530 already limits the weight of adhered products to 15 psf.

*Current language of Section 1408.2.1 does not meet Approval Criteria #6 and #7.* The intent of this section is to ensure adhered veneer systems have sufficient bonding to the building surface and substrate and specific laboratory procedures for this have been specified by referencing ACI 530, Section 6.3.2.4. However, the second paragraph to this section requires field testing for the installed bond strength based on an arbitrary building size (floor area). Installed adhered veneer systems are not typically installed as a function of the floor size of the building, rather based on coverage (sf) of wall area. The possible effect of the current language is to require testing for wall sections where only very limited amounts of adhered veneer may be installed. In addition, there is no reference given in the current language regarding an accepted or nationally recognized in-field procedure for bond strength; leaving discretionary judgment to enforcement officials. Because of this, we believe there is currently little to no enforcement on this portion of this provision today. Until this procedure is established and other elements of these provisions are clarified it is premature to require field testing for bond strength and the current language should be removed.

## **HEALTH & SAFETY CODE SECTION 18930**

### **SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS**

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
  - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.

- (3) The public interest requires the adoption of the building standards.
- (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
- (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
- (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
- (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
  - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
  - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
- (8) The format of the proposed building standards is consistent with that adopted by the commission.
- (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.